



Eric Gonzalez  
District Attorney

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[INSERT NAME]  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: SHANTE TERRELL

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

THE NYPD AND CCRB SUBSTANTIATED THE FOLLOWING ALLEGATIONS AGAINST MOS TERRELL ARISING OUT OF AN INCIDENT ON 01/29/2015 AT APPROXIMATELY 1907 HOURS IN THE VICINITY OF A LOCATION KNOWN TO THE DEPARTMENT IN KINGS COUNTY, WHILE MOS WAS ON DUTY AND ASSIGNED TO THE NARCOTICS BOROUGH BROOKLYN SOUTH:

**ALLEGATIONS:**

1. MOS TERRELL ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY, OR DISCIPLINE OF THE DEPARTMENT, IN THAT HE STOPPED A VEHICLE OCCUPIED BY AN INDIVIDUAL KNOWN TO THE DEPARTMENT, WITHOUT SUFFICIENT LEGAL AUTHORITY.
2. MOS TERRELL ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY, OR DISCIPLINE OF THE DEPARTMENT, IN THAT HE USED FORCE WITHOUT POLICE NECESSITY WHEN HE POINTED HIS GUN AT SAID INDIVIDUAL KNOWN TO THE DEPARTMENT.
3. MOS TERRELL ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY, OR DISCIPLINE OF THE DEPARTMENT, IN THAT HE SPOKE DISCOURTEOUSLY TO SAID INDIVIDUAL KNOWN TO THE DEPARTMENT.
4. MOS TERRELL ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY, OR DISCIPLINE OF THE DEPARTMENT, IN THAT HE SEARCHED THE VEHICLE IN WHICH SAID INDIVIDUAL KNOWN TO THE DEPARTMENT WAS AN OCCUPANT, WITHOUT SUFFICIENT LEGAL AUTHORITY.
5. MOS TERRELL FAILED TO PREPARE MEMO BOOK ENTRIES, AS REQUIRED.
6. MOS TERRELL FAILED TO PREPARE A UF-250 (STOP REPORT), AS REQUIRED.

CASE STATUS: CLOSED ON 02/16/2018

ACTION TAKEN: SCHEDULE B COMMAND DISCIPLINE AND MOS WARNED AND ADMONISHED

**Disclosure # 2:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 02/26/2019, AGAINST MOS TERRELL: ALLEGATION(S):

1. INVOICE DISCREPANCY - LAB - CONTROLLED SUBSTANCE
2. REPORT INCOMPLETE/INACCURATE - PROPERTY CLERK INVOICE

CASE STATUS: CLOSED ON 04/04/2019

ACTION TAKEN: VERBAL INSTRUCTIONS

**Disclosure # 3:**

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

1. TYSHAWN SMITH V. CITY OF NEW YORK, ET AL, 500121-2012, FILED IN THE EASTERN DISTRICT OF NEW YORK.
2. DAVID RICHARDSON V. CITY OF NEW YORK, ET AL, 12-CV-888, FILED IN THE EASTERN DISTRICT OF NEW YORK.

**Disclosure # 4: (PENDING)**

THE FOLLOWING NYPD ALLEGATIONS, DATED 08/06/2020, ARE PENDING AGAINST MOS TERRELL:  
ALLEGATIONS:

■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

CASE STATUS: PENDING

**Disclosure # 5: (PENDING)**

THE FOLLOWING NYPD ALLEGATIONS, DATED 10/20/2020, ARE PENDING AGAINST MOS TERRELL:  
ALLEGATIONS:

■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

CASE STATUS: PENDING

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:**

**Disclosure # 6:**

CCRB CASE: 201003780

REPORT DATE: 03/19/2010

INCIDENT DATE: 03/11/2010

CCRB SUBSTANTIATED ALLEGATION(S):

1. ABUSE - PREMISES ENTERED AND/OR SEARCHED
2. ABUSE - SEARCH (OF PERSON)
3. ABUSE - STOP

NYPD DISPOSITION: INSTRUCTIONS PROVIDED

**Disclosure # 7:**

CCRB CASE: 201500715

REPORT DATE: 01/30/2015

INCIDENT DATE: 01/29/2015

CCRB SUBSTANTIATED ALLEGATION(S):

1. FORCE - GUN POINTED
2. ABUSE - VEHICLE SEARCH
3. ABUSE - VEHICLE STOP
4. DISCOURTESY – WORD

NYPD DISPOSITION: COMMAND DISCIPLINE B

OTHER MISCONDUCT NOTED:

1. FAILURE TO PREPARE A MEMO BOOK ENTRY
  2. FAILURE TO PRODUCE STOP AND FRISK REPORT
- NYPD DISPOSITION: COMMAND DISCIPLINE B

**Disclosure # 8: (PENDING)**

CCRB CASE: 202005604

REPORT DATE: 08/12/2020

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Disclosure # 9: (PENDING)**

CCRB CASE: 202005606

REPORT DATE: 08/12/2020

[REDACTED]  
[REDACTED]  
[REDACTED]

Eric Gonzalez  
District Attorney  
Kings County